

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER PARTNERS II LLC,

Plaintiff and Counterclaim-Defendant,

v.

CELLCO PARTNERSHIP, D/B/A VERIZON
WIRELESS, AND VERIZON CORPORATE
SERVICES GROUP INC.,

Defendants and Counterclaimant-Plaintiffs.

Case No. 2:24-cv-00007-JRG-RSP

JURY DEMANDED

**JOINT MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER**

Plaintiff Headwater Partners II LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless, and Verizon Corporate Services Group Inc. (collectively, “Verizon” or “Defendants”) (all together, the “Parties”), hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

Dated: April 25, 2024

/s/ Jacob K. Baron

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this April 25, 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster
Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster
Marc Fenster